

Hawkins, Cheryla

From: Cogliano, Vincent
Sent: Tuesday, November 14, 2017 5:28 PM
To: (b) (6)
Cc: Sinks, Tom; (b) (6) Otto, Martha; Hawkins, Cheryla
Subject: Response regarding allegation of scientific integrity violation

Dear (b) (6)

I have taken over from Kevin Teichman the role as the back-up to Francesca Grifo, the U.S. Environmental Protection Agency (EPA) Scientific Integrity Official, during her extended absence. I am writing to follow-up on your allegation of a violation of the EPA Scientific Integrity Policy which you originally submitted on January 5, 2017. Kevin Teichman addressed your concerns on August 4, 2017, and we received two subsequent emails from you on August 16, 2017, and October 14, 2017.

In your August 16, 2017 email, you stated that (b) (6) had asked (b) (6) (the (b) (6)) to remove you from the work in question on multiple occasions, which could potentially be a contract violation. Alleged contract violations are not investigated by the Scientific Integrity Program. However, managers in (b) (6) contacted (b) (6) (b) (6) Service Center contracting officer responsible for the contract in question, about your allegation. (b) (6) regarding whether or not (b) (6) had instructed him to remove you from the work assignment. (b) (6) replied (b) (6) did not make a request to remove you from the work assignment. (b) (6) also stated as the (b) (6) manager, he ultimately has the authority to assign (b) (6) staff to projects and he made the decision to remove you entirely on his own.

The EPA Scientific Integrity Policy states, ". . . all Agency employees, including scientists, managers, and political appointees, are required to follow this policy when engaging in, supervising, managing, or influencing scientific activities. . . . In addition, all contractors, grantees, collaborators and student volunteers of the agency who engage in scientific activities are expected to uphold the standards established by this policy . . ." While EPA employees are required to follow the Scientific Integrity Policy, contractors are only "expected to uphold the policy," for this reason we have no authority over the actions of contractors at (b) (6)

In addition, the EPA Scientific Integrity Policy does not specifically address authorship, instead the Scientific Integrity Program developed the Best Practices for Designating Authorship as a guide to EPA employees. The Best Practices document promotes a common understanding across the Agency for attributing credit and accountability to individuals who contribute to work products that designate authorship. These Best Practices provide criteria that merit authorship, but also acknowledge that a substantial contribution may justify acknowledgement rather than authorship. Ultimately, the Best Practices guide is intended to inform authorship decisions, not to replace decisions made by the team of researchers who are responsible for the work product. The EPA Scientific Integrity Official does not dictate to EPA scientists who should be included as authors on their manuscripts.

Finally, in your October 14, 2017, email to Kevin Teichman you expressed concern about "mis-characterizations and inaccuracies about the model code" in the third publication. The Scientific Integrity Program does not attempt to settle the science in cases of differing scientific opinions. You might consider contacting the journal regarding your concerns.

We believe the allegation involving authorship you submitted on January 5, 2017, is now closed within our purview.

Sincerely yours,
Vincent Cogliano, PhD

Office of the Science Advisor

U.S. Environmental Protection Agency
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Washington DC 20460

Hawkins, CherylA

From: Teichman, Kevin
Sent: Friday, August 04, 2017 8:20 AM
To: (b) (6)
Cc: Sinks, Tom; (b) (6); Hawkins, CherylA; Otto, Martha; Grifo, Francesca; (b) (6)
Subject: Your Alleged violation of EPA's Scientific Integrity Policy

Dear (b) (6)

I am writing in response to an email you sent Francesca Grifo on January 5, 2017, regarding an alleged violation of U.S. Environmental Protection Agency's (EPA) Scientific Integrity Policy. Dr. Grifo will be out of the office for an extended period of time, and I am currently acting as her backup during her absence.

In the allegation you submitted, you allege you were excluded from three research manuscripts, one of which had been published and the other two were in development. The three articles in question are:

- 1.
- 2.
- 3.

(b) (6)

The Scientific Integrity Team contacted (b) (6) of the US EPA (b) (6) (b) (6) to discuss your allegation. (b) (6) then discussed the issue with (b) (6) managers and mentors familiar with the manuscripts and (b) (6) scientists who are co-authors on the manuscripts. He reported to us their perspectives on the issue.

Based on the information received from (b) (6) the Scientific Integrity Team has concluded the following with respect to the three articles in question:

- With regard to the first article, the lead/corresponding author was from the (b) (6) (b) (6) and thus the ultimate decision of authorship rests with (b) (6). Any dispute with regard to authorship should be addressed by (b) (6).
- With regard to the second article, the lead author was from the (b) (6). The issue was discussed with the lead author, and he said he felt that you did not make an intellectual contribution to the article deserving authorship. He acknowledged the manuscript made reference to work you had published previously and was cited in the manuscript accordingly. He also said he corresponded with the (b) (6) principal investigator on the project regarding which staff from (b) (6) should be included as authors on the manuscript and who should be included in the acknowledgements section. The (b) (6) principal investigator confirmed that you should be included in the acknowledgements section.

- For the third article, similar to the first article, the lead author was from (b) (6). The only US EPA author on the article is (b) (6) had himself removed from the author list. Any dispute with regard to authorship should be addressed by (b) (6).

(b) (6) also provided a list of 13 published articles related to the three manuscripts that are the focus of your allegation. He noted that you were listed as an author on nine of 13 of the manuscripts, including two in which you were the lead author. He also noted that the articles on which you were included as an author corresponded to your time as a Federal Post Doc at EPA, and thus supports that you were encouraged to author manuscripts during your time at EPA. Since the manuscripts that are the focus of your allegation were developed since you moved to (b) (6) it is difficult for the EPA to determine your role in their development.

In your allegation, you also discussed being included on four presentations without being given an opportunity to revise the materials and being excluded all together on a fifth presentation related to your work. You stated that the presentations were for work that you completed at (b) (6) under a contract between a (b) (6) principal investigator and US EPA. Again, the Scientific Integrity Team believes issues related to these presentations are the responsibility of (b) (6) to address.

While we are not familiar with (b) (6) policies with respect to authorship on papers or presentations, at EPA we have a "Best Practices for Designating Authorship" document that may be helpful. The link to the document is:

https://www.epa.gov/sites/production/files/201609/documents/best_practices_designating_authorship.pdf

If you have any questions or wish to provide any further information, please let me know.

Sincerely,

Kevin Teichman, PhD
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